

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ALABAMA - WESTERN DIVISION**

IN RE:)	
)	
Geneva Manuel)	BK. NO. 13-71065-CMS-13
)	
DEBTOR(S).)	

**MOTION TO MODIFY AMOUNT PAID TO UNSECURED CREDITORS
TO POT PLAN OF \$1,650 & KEEP PLAN PAYMENTS AT \$360 PER MONTH**

Comes now Your Debtor, by and through Counsel of record, and moves this Honorable Court pursuant to **§ 1329, § 1322 and § 1325 of the Bankruptcy Code** to approve the modification of their plan post-confirmation to pay UNSECURED CREDITORS \$1,650 and keep plan payments at \$360 per month. As grounds for this Motion the Debtor would show the following:

1. Debtor's plan was proposed as a 100% case and the plan was confirmed at a 100% case with payments of \$360 per month.
2. Unanticipated claims filed have rendered this case not feasible.
3. These factors allow for a modification to a pot plan amount of \$1,650 (liquidation) which would allow plan payments to remain at \$360 per month.
4. This modification meets the disposable income and liquidation analysis.
5. Debtor requests that this be set December 17, 2013 along with Trustee's Motion to Dismiss Case.

WHEREFORE, Debtors respectfully request this Honorable Court to approve the modification.

Respectfully Submitted,

/s/ Eric M. Wilson
Eric M. Wilson
The Law Firm of Eric M. Wilson, LLC
1902 8th Street
Tuscaloosa, AL 35401
(205) 349-1280

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been served upon the following:

C. David Cottingham
Chapter 13 Standing Trustee
1307 25th Ave.
Tuscaloosa, AL 35401

MATRIX

By mailing a copy of the same in the U.S. Mail, properly addressed, and first class postage prepaid, or by hand delivery.

This the 13th day of November 2013.

/s/ Eric M. Wilson